

AO 91 (Rev. 08/09) Criminal Complaint

Special Agent : Nicholas Daly

Telephone: 989-414-0081

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America,

Plaintiff,

v.

Jawaunte Balknight

Case: 4:22-mj-30288

Assigned To : Ivy, Curtis, Jr

Assign. Date : 6/29/2022

Description: COMP USA V

BALKNIGHT (kcm)

Defendant(s).

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief:

On or about the date(s) of June 24, 2022, in the county of Genesee
in the Eastern District of Michigan, the defendant(s) violated:

Code Section

21 U.S.C. § 841(a)(1),
21 U.S.C. § 841(b)(1)(B)(viii)

Offense Description

Possession with intent to distribute more than 50 grams of a mixture
or substance containing a detectable amount of methamphetamine,

This criminal complaint is based on these facts:
Please see the attached affidavit.



Continued on the attached sheet.



Complainant's signature

Nicholas Daly, Special Agent - DEA

Printed name and title

Sworn to before me and signed in my presence.

Date: June 29, 2022



Judge's signature

City and state: Flint, Michigan

Curtis Ivy, Jr., United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

1. I, Drug Enforcement Administration Special Agent Nicholas Daly, being duly sworn, hereby depose and state the following:

Introduction and Agent Background

2. The purpose of this affidavit is to establish probable cause that on or about June 24, 2022, Jawaunte Balknight (DOB: xx/xx/1987) knowingly possessed with the intent to distribute more than 50 grams of a mixture or substance containing a detectable amount of methamphetamine in the Eastern District of Michigan, in violation of 21 U.S.C. §§ 841(a)(1), and 841(b)(1)(B)(viii).

3. I am a Special Agent (“SA”) with the Drug Enforcement Administration (“DEA”) assigned to the Detroit Field Division, Flint Resident Office, which is located in Genesee County and in the Eastern District of Michigan. As such, I am a federal law enforcement officer within the meaning of Federal Rule of Criminal Procedure 41 (a)(2)(c), that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for federal criminal offenses and make request for warrants. I have been so empowered since October 31, 2016. I have received specialized training on the subject of drug trafficking and

money laundering from the DEA. I have additional experience within the law enforcement field as I was employed by the Indiana State Police as a Trooper for about three and a half years. Additionally, I worked as a police officer for the City of Hammond, Indiana Police Department for about one year. In addition to training received from the DEA, I have been trained by the Indiana State Police Academy, located in Plainfield, Indiana. I am presently involved in investigating covert and overt drug trafficking complaints. During my employment with DEA, I have received specialized training in and on the subject of drug trafficking from the DEA. I have also participated in numerous confidential source debriefings, defendant interviews, and witness interviews regarding the illegal manufacturing, distribution, and consumption of illegal drugs. I have also participated in numerous investigations involving the manufacturing, transportation, and/or distribution of controlled substances. Furthermore, I have worked in conjunction with other federal and local law enforcement agencies investigating illegal trafficking of controlled substances. Through the combined training and experience I have received as a DEA agent I have become familiar with how drug traffickers distribute drugs.

4. I make this affidavit from personal knowledge based on the following: my participation in this investigation, including witnessing interviews by myself and/or other law enforcement officers, communications with others who have personal knowledge of the events and circumstances described herein, and information gathered through my training and experience. The information outlined below is for the limited purpose of obtaining a criminal complaint and an arrest warrant. I have not set forth every fact I have learned in this investigation.

Probable Cause

5. On June 24, 2022, at approximately 10:45 p.m., members from the DEA Flint Resident Office and other law enforcement officers established surveillance at the Flint Bishop International Airport, in the Eastern District of Michigan, awaiting the arrival of Allegiant Airlines Flight #2842 inbound from Las Vegas, Nevada.

6. Before Allegiant Airlines Flight #2842 arrived, law enforcement officers suspected that Jawaunte Balknight was on this flight based on flight records obtained via subpoena. Those records showed that his identified telephone number was used to book flight itinerary #BYYQFH for passenger “Jamario France.”

7. Before Allegiant Airlines Flight #2842 arrived, law enforcement officers conducted a Law Enforcement Information Network (LEIN) check and confirmed that Balknight had an active felony warrant out of the Coldwater Police

Department in Michigan. On this same date, Genesee County dispatch received a LEIN confirmation from the Coldwater Police Department stating that they wanted a hold placed on Balknight for this arrest warrant.

8. At approximately 11:12 p.m., Allegiant Airlines Flight #2842 arrived at the Flint Bishop International Airport. Surveillance personnel observed Balknight deboard the plane and walk towards the baggage claim area in the terminal. At the baggage claim area, Balknight waited near the luggage carousel.

9. Law enforcement officers then arrested Balknight for his active felony warrant. Upon searching Balknight incident to his arrest, law enforcement officers found his wallet, which contained a Michigan driver's license for "Jamario France." Law enforcement officers transported Balknight to the Flint Resident Office.

10. At around this same time, law enforcement officers located a checked suitcase associated with flight itinerary #BYYQFH for passenger "Jamario France," whose name was printed on the luggage tag for the suitcase. Upon finding the suitcase, Genesee County Sheriff's Office Sgt. Hunt deployed his trained narcotics dog, "Max," who conducted a free-air sniff of the exterior of the suitcase and alerted to the presence of controlled substances inside it. "Max" is trained and certified through the National Association of Professional Canine Handlers

(NAPCH) in the detection of narcotics. “Max” is certified and trained in the recognition of cocaine, crack cocaine, heroin, black tar heroin, methamphetamine, crystal methamphetamine, and MDMA/Ecstasy. At this time, agents seized the suitcase and transported it to the Flint Resident Office.

11. At the Flint Resident Office, law enforcement officers interviewed Balknight. Before questioning, he was advised of his *Miranda* rights. He acknowledged that he understood his rights and agreed to speak with investigators. Balknight then admitted that the suitcase belonged to him and he consented, in writing, to allow law enforcement officers to search it. Before agents searched his suitcase, Balknight informed DEA agents that the suitcase contained about one pound of crystal methamphetamine. Balknight further explained that he was transporting the narcotics to Michigan, where he planned to deliver it to Person-1 in Flint. Balknight informed investigators that Person-1 paid him to transport the narcotics. Balknight admitted that he traveled to Phoenix, where he met with Person-2 to acquire the methamphetamine. Balknight disclosed that he has also traveled to Arizona to pick up narcotics from Person-2 on other occasions, and has delivered them to Flint for further distribution.

12. Upon searching the suitcase, law enforcement officers found heat-sealed packaging containing approximately 492 grams (over one pound) of suspected crystal methamphetamine. The suspected crystal methamphetamine was field-tested using a TruNarc test and yielded a positive result for the presence of methamphetamine. Law enforcement officers also noticed men's clothing in the suitcase, which Balknight admitted belonged to him.

13. Based on my training and experience, one pound of methamphetamine is inconsistent with personal use and shows an intent to distribute. I know that crystal methamphetamine is commonly obtained from drug sources in pound quantities, and subsequently divided into smaller quantities to be further distributed. Based on the fact that the quantity seized from Balknight was greater than one pound of suspected methamphetamine, I believe that this is consistent with the intent to distribute as opposed to personal use. Further, I am aware through training and experience, as well as through conversations with other law enforcement officers, that a common dosage unit for a methamphetamine user is about one gram.

Conclusion

14. Based on the above, there is probable cause to believe that on June 24, 2022, Balknight knowingly possessed with the intent to distribute more than 50 grams of a mixture or substance containing a detectable amount of methamphetamine in the Eastern District of Michigan, in violation of 21 U.S.C. §§ 841(a)(1), and 841(b)(1)(B)(viii).

Respectfully submitted,



Nicholas Daly
DEA Special Agent

Sworn to before me and signed in my presence and/or by
reliable electronic means on June 29, 2022.



Curtis Ivy, Jr.
United States Magistrate Judge